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*Attorneys for Plaintiff Progressive
Northern Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**PROGRESSIVE NORTHERN INSURANCE
COMPANY;**

Plaintiff,

V.

TONY PETE FLORES aka RUDY
HERNANDEZ, an individual; MA
TERESA GUZMAN VALDIVIA, an
individual; MA TERESA GUZMAN
VALDIVIA as Special Administrator of
the Estate of JOSE DE JESUS
GUZMAN CERVANTES and mother of
minors MONCERRAT GUZMAN,
EDUARDO GUZMAN, and ANTHONY
GUZMAN.

Defendants.

Case No.: 2:24-cv-02207-RFB-BNW

STIPULATION AND ORDER TO:

(1) EXTEND DEFENDANT TONY PETE FLORES' DEADLINE TO ANSWER COMPLAINT (ECF No. 1);

**(2) EXTEND DEFENDANTS' DEADLINE
TO RESPOND TO MOTION FOR SPEEDY
HEARING (ECF No. 14);**

and

**(3) SET ASIDE MOTION TO STRIKE
AND JOINDER THERETO (ECF NOS.
16 & 18)**

(FIRST REQUEST)

1 Pursuant to Local Rule IA 6-1 and FRCP 6(b)(1)(B), the parties
2 stipulate as follows:

3 1. Defendant Tony Pete Flores shall have a 14-day extension of time,
4 through February 7, 2025, to file an answer to plaintiff's complaint. (ECF No.
5 1.) This is the first request for extension. Good cause exists to extend the
6 deadline. Counsel for defendant Flores was retained on January 24, the day
7 the answer would otherwise be due, and needs additional time to familiarize
8 himself with the case. This request is not made for the purpose of delay.

9 2. Defendants shall have an additional 14 days to respond, through
10 February 6, 2025, to the Motion for Speedy Hearing on Plaintiff's Declaratory
11 Judgment Claim. (ECF No. 14.) This is the first request to extend this
12 deadline. There was some confusion surrounding the service of plaintiff's
13 motion that prompted defendant Flores to file a motion to strike (ECF No. 16),
14 which the Guzman defendants joined (ECF No. 18). Rather than expend
15 additional resources briefing the motion to strike, the parties have agreed to
16 an extension of time for defendants to respond, which will not impact other
17 deadlines or cause unnecessary delay.

18 3. Defendant Tony Flores' Motion to Strike for Lack of Service
19 Plaintiff's Motion for a Speedy Hearing (ECF No. 16) and the Guzman
20 defendants' joinder thereto (ECF No. 18) shall be set aside and vacated.
21 Given the parties' agreement to extend the time to respond to plaintiff's
22 motion for speedy trial (ECF No. 14) above, the motion to strike and joinder
23 are now moot.

24 Dated this 29th day of January, 2025.

25 WOMBLE BOND DICKINSON (US) LLP

HILTON PARKER LLC

26

27 By: /s/J. Christopher Jorgensen

DANIEL F. POLSENBERG (SBN 2376)
J CHRISTOPHER JORGENSEN (SBN 5382)

By: /s/Jonathan L. Hilton
JONATHAN L. HILTON (SBN
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7658 Slate Ridge Boulevard



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10 *Attorneys for Plaintiff Progressive
Northern Insurance Company*

11 THE SCHNITZER LAW FIRM

12 By: /s/Jordan P. Schnitzer
13 JORDAN P. SCHNITZER (SBN 10,744)
14 710 South 9th Street, Suite 2
15 Las Vegas, Nevada 89101
16 (702) 960-4050

17 *Attorneys for Guzman Defendants*

18
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20 IT IS SO ORDERED:
21
22



23 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

24 DATED: This 30th day of January, 2025.
25
26
27
28



Kapolnai, Emily

From: Jonathan Hilton <jhilton@hiltonparker.com>
Sent: Tuesday, January 28, 2025 9:10 AM
To: Jorgensen, Christopher
Cc: Jordan Schnitzer; Jaramillo, Annette; McCormick-Huhn, John; Kapolnai, Emily; Helm, Jessica; Koerperich, Kory
Subject: Re: Progressive v. Tony Pete Flores - Motion to Strike and Joinder

CAUTION! [External to Womble Bond Dickinson]

This is fine with me. Thanks.

On Tue, Jan 28, 2025 at 11:58 AM Jorgensen, Christopher <Chris.Jorgensen@wbd-us.com> wrote:

Progressive v. Guzman/Flores

Stipulation regarding Motion to Strike and extension of time

Jonathan and Jordan,

Following up on the stipulation.

Please let me know if we can insert your signatures and file.

Thank you,

Chris

Christopher Jorgensen
Partner
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Kapolnai, Emily

From: Jordan Schnitzer <Jordan@TheSchnitzerLawFirm.com>
Sent: Tuesday, January 28, 2025 7:20 PM
To: Jorgensen, Christopher; Jonathan Hilton
Cc: Jaramillo, Annette; McCormick-Huhn, John; Kapolnai, Emily; Helm, Jessica; Koerperich, Kory
Subject: RE: Progressive v. Tony Pete Flores - Motion to Strike and Joinder

CAUTION! [External to Womble Bond Dickinson]

You can e-sign for me.

Jordan P. Schnitzer, Esq.



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From: Jorgensen, Christopher <Chris.Jorgensen@wbd-us.com>
Sent: Tuesday, January 28, 2025 8:58 AM
To: Jonathan Hilton <jhilton@hiltonparker.com>; Jordan Schnitzer <Jordan@TheSchnitzerLawFirm.com>
Cc: Jaramillo, Annette <Annette.Jaramillo@wbd-us.com>; McCormick-Huhn, John <John.McCormick-Huhn@wbd-us.com>; Kapolnai, Emily <Emily.Kapolnai@wbd-us.com>; Helm, Jessica <Jessica.Helm@wbd-us.com>; Koerperich, Kory <Kory.Koerperich@wbd-us.com>; Jorgensen, Christopher <Chris.Jorgensen@wbd-us.com>
Subject: RE: Progressive v. Tony Pete Flores - Motion to Strike and Joinder

Progressive v. Guzman/Flores
Stipulation regarding Motion to Strike and extension of time

Jonathan and Jordan,
Following up on the stipulation.
Please let me know if we can insert your signatures and file.
Thank you,
Chris

Christopher Jorgensen
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